

The regulatory transformation of independent managers

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Until 2019, independent managers escaped all prudential supervision. They only had to comply with the Anti-Money Laundering Act, by affiliating with a self-regulatory organisation. This situation, often criticised, contrasted with that of the banks and with the regimes in force in neighbouring countries.

The entry into force of the Financial Institutions Act on 1 January 2020 put an end to this exception. Managers must now obtain an authorisation from FINMA and are supervised by supervisory organisations, as Chapter IV described.¹ The transitional regime expired at the end of 2022.

The outcome of this transformation can now be measured. According to a sector analysis published in January 2026, out of 1,864 applications filed in total, FINMA had approved 1,532 by February 2025; more than 40 per cent of applications required at least five rounds of amendments; around 650 managers did not file an application, which represents a 26 per cent decline in the number of players, and the authorised institutions now file some 1,700 applications for modification per year.² The same analysis notes that median assets under management, at CHF 61 million, lie increasingly below the viability threshold, that eleven merger and acquisition transactions were publicly announced in 2023, and that an audit firm projects a reduction of 10 to 25 per cent in the number of managers by 2026–2027.³

These figures confirm the logic described in the preceding chapter: the fixed costs of authorisation, supervision, audit and compliance impose a minimum size. Small managers have three options: to combine, to join a platform that pools compliance, technology and administrative functions, or to cease their activity. Service platforms for managers have developed accordingly; the largest in Switzerland is, according to the same source, a Zurich company.⁴

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For the Geneva financial centre, this transformation has had mixed effects. It has reduced the number of players and concentrated assets. It has also raised the level of professionalism, strengthened client protection and increased the credibility of the model in the eyes of foreign authorities. The managers who have obtained their authorisation hold a label that their clients and their custodian banks recognise.

Indicator (source: Val Index, January 2026)	Value
Authorisation applications filed	1,864
Applications approved by FINMA by February 2025	1,532
Applications requiring at least five rounds of amendments	more than 40%
Managers who did not file an application	around 650, i.e. a decline of 26%
Median assets under management	CHF 61 million
Merger and acquisition transactions announced in 2023	11

Worked example. An independent manager manages CHF 61 million, the median amount recorded by the analysis cited. At a gross margin of 0.9 per cent, his revenues amount to CHF 549,000 per year. If he employs two partners and an assistant, for CHF 400,000 of staff costs, and bears CHF 150,000 of supervision, audit, compliance and technology costs, he is left with less than CHF 1,000. This manager can survive only by cutting his costs, joining a platform or combining with others. The figures, apart from the median amount, are fictitious.

1 Notes

1. FINMA, press release of 7 July 2020, “Mise en œuvre LSFin/LEFin : la FINMA autorise les premiers organismes de surveillance” (Implementation of FinSA/FinIA: FINMA authorises the first supervisory organisations). ↩
2. Val Index, “Gestionnaires de fortune indépendants Suisse : ~2 500 firmes, SWOT & data” (Independent wealth managers in Switzerland: ~2,500 firms, SWOT & data), valindex.ch, 31 January 2026. ↩
3. Val Index, cited above. ↩

4. Val Index, cited above, which cites Aquila SA. ↩

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